

W.K., et al v. Red Roof Inns, Inc., et al

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

W.K., E.H., M.M., R.P., M.B.,
D.P., A.F., C.A., R.K. and K.P.,

Plaintiffs,

vs.

CIVIL ACTION NO.:
1:20-CV-05263-VMC

RED ROOF INNS, INC.; FMW RRI
NC, LLC; RED ROOF FRANCHISING,
LLC; RRI WEST MANAGEMENT, LLC;
VAHARI HOTEL, LLC; WESTMONT
HOSPITALITY GROUP, INC.;
and RRI III, LLC,
Defendants.

C O N F I D E N T I A L

VIDEO DEPOSITION OF E.H.

October 12, 2022

9:20 a.m.

1201 West Peachtree Street, Suite 3200

Atlanta, Georgia

Carolyn M. Carboni, RPR, RMR, CCR-B-878

Leo Mileman, Videographer

PL Sum. J.
Ex. 008

1 APPEARANCES OF COUNSEL:

2 On behalf of the Plaintiffs in Jane Doe, et al. v.
3 Westmont Hospitality Group, et al. case:

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10 On behalf of the Defendants Red Roof Inns, Inc.;
11 FMW RRI NC, LLC; Red Roof Franchising, LLC; RRI
12 West Management, LLC; Westmont Hospitality Group,
13 Inc.; and RRI III, LLC:

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1 APPEARANCES (Continued):

2 Also Present:

3 Beth Richardson (via Zoom)

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9 (Pursuant to Article 10(B) of the Rules

10 and Regulations of the Georgia Board of Court

11 Reporting, a written disclosure statement was

12 submitted by the court reporter to all counsel

13 present at the proceeding.)

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1 to say you don't recall where your first trick
2 happened?

3 A No, I don't.

4 Q Okay. All right. And we'll drill into
5 this a little bit more, but you started telling me
6 about the first time that you, as you've alleged,
7 were subjected to sex trafficking at the Smyrna Red
8 Roof Inn, and that that occurred sometime in 2014?

9 A Yes, sir.

10 Q Okay. And again, do you have any better
11 understanding or memory as to when in 2014 that
12 first time at the Smyrna Red Roof happened?

13 A No, sir.

14 Q Okay. Do you know whether it was closer
15 to the, you know, beginning of the year, January,
16 end of the year December?

17 A No, sir.

18 Q No idea whatsoever?

19 A I don't.

20 Q Okay. And when, Ms. [REDACTED] did your sex
21 trafficking end?

22 A It was roughly the middle of September of
23 2018.

24 Q Okay. Do you recall your last trick?

25 A No, I don't.

1 Q Do you remember where it happened?

2 A It was at the Red Roof.

3 Q At the Smyrna Red Roof?

4 A Yes.

5 Q And you said middle of September of 2018?

6 A Yes, sir.

7 Q Okay. Is there something specific that
8 helps you remember it was the middle of September
9 of 2018?

10 A My fiance as of right now, he and I -- our
11 anniversary is September 19th. And we got back
12 together September 19th of 2018. So that is kind
13 of like a anniversary marking. And that much I do
14 know for sure.

15 But it was probably like a few days prior
16 to that. I don't exactly remember which date, but
17 I do know that it was a few days prior to me and
18 him rekindling our relationship.

19 Q And what is your fiance's name?

20 A [REDACTED].

21 Q All right. So you and Mr. [REDACTED] got back
22 together, which I guess implies y'all were together
23 sometime before September of 2018, right?

24 A Yes, sir.

25 Q Okay. So y'all got back together in

1 September the 19th of 2018, and from then on, you
2 were no longer subjected to sex trafficking?

3 A Yes, sir.

4 Q Okay. And, in fact, you believe it was, I
5 think you said, a few days prior to the 19th of
6 September?

7 A Yes, sir.

8 Q Okay. And that's when it all ended?

9 A Yes, sir.

10 Q Okay. All right. Who was your
11 trafficker?

12 A Can you clarify if I'm supposed to say, I
13 guess, his actual name or what I called him?

14 Q That's fine. Do you know his actual name,
15 his real name?

16 A Yes, I do.

17 Q What is it?

18 A [REDACTED].

19 Q Can you spell his first name for us?

20 A I think it's [REDACTED].

21 Q Do you know his middle name?

22 A [REDACTED]

23 Q I'm sorry?

24 A [REDACTED]

25 Q All right. And did he go by other names

1 that you called him at times?

2 A Yes.

3 Q What other names did Mr. [REDACTED] go by?

4 A T, Mr. [REDACTED] [REDACTED] and Houston.

5 Q Do you know why he went by Houston at
6 times?

7 A That's where he was from.

8 Q He's from Houston?

9 A Yes, sir.

10 Q Did you have any other trafficker during
11 this 2012 to September 2018 time frame?

12 A No, sir.

13 Q When things first started in, I think you
14 said, around the fall of 2012 in downtown Atlanta,
15 did that first trick happen at a hotel, at a
16 business, at a residence?

17 A I don't remember.

18 Q Do you remember what part of downtown?

19 A I don't.

20 Q Do you remember anything about the street
21 or the building?

22 A Not really.

23 Q Ms. [REDACTED] do you know how many different
24 hotels you, as you've alleged, have been subjected
25 to sex trafficking at?

1 A Probably a little less than that.

2 Q So is it fair to say that between 2012 and
3 2018, Mr. [REDACTED] subjected somewhere between 10 and
4 20 other women to sex trafficking?

5 A Yes, sir.

6 Q Were you ever subjected to sex trafficking
7 alongside more than one other woman at the hands of
8 Mr. [REDACTED]

9 A Yes, sir.

10 Q What's the largest number of women that
11 were ever subjected to sex trafficking together at
12 the same time at the hands of Mr. [REDACTED]

13 A Up to five.

14 Q Okay. Were there times when, during this
15 2012 to 2018 when you were subjected to sex
16 trafficking at the hands of Mr. [REDACTED] that there
17 were no other women besides yourself?

18 A Yes, sir.

19 Q Do you -- Ms. [REDACTED] do you know the names
20 of any of those other women?

21 A Yes, sir.

22 Q Tell me the ones that you do know.

23 A [REDACTED].

24 MS. HENRY: What was the first name?

25 THE WITNESS: [REDACTED].

1 Q Almost 18?

2 A Yeah, yes, sir.

3 Q Okay. Any other police reports or records
4 you remember looking at?

5 A There was one from Alabama where I had
6 some drug paraphernalia on me. There was another,
7 I think, from Lawrenceville, I believe, from
8 Gwinnett. It was like a aggravated assault or
9 something like that, but I think that one was the
10 one that led me to probation. And that's really
11 all I can remember at the moment.

12 Q Okay. How about -- you said you looked at
13 pictures. Tell me about the pictures you can
14 remember looking at.

15 A One of them was of [REDACTED] One of them
16 was the brand that's on my shoulder.

17 Q When you say "brand," is it branded like
18 with something hot or is it like a tattoo brand?

19 A It's a tattoo, but it might as well have
20 been burned into my skin because that's what it
21 looks like.

22 Q What does it look -- what does it show?
23 What is it?

24 A It's [REDACTED] business logo.

25 Q I've seen some things that looked like --

1 I don't know if I saw it right, it looked like 1GG
2 or something, is that what it is?

3 A Yes, sir.

4 Q It's the number 1 and then a capital G and
5 a capital G?

6 A Yes, sir.

7 Q Okay. And you have that on your -- the
8 back of your -- is it left shoulder?

9 A Yes, sir.

10 Q Okay. All right. What other pictures do
11 you remember?

12 A I think there was one with the same tattoo
13 with, like, \$5,000 around it.

14 Q Around your shoulder?

15 A Yeah, around the tattoo.

16 Q Okay.

17 A Which was from one trick. That's all --
18 really all the pictures that I remember right off
19 the top of my head.

20 Q You once had a trick who paid \$5,000?

21 A Yes, sir.

22 Q What did he pay \$5,000 for?

23 A \$5,000 was the down payment for two days
24 with me.

25 Q Two full days?

1 A He ended up giving us, like, another 15
2 grand.

3 Q 15,000?

4 A Yes, sir.

5 Q Is that a lot compared to your other
6 tricks?

7 A Yes, sir.

8 Q Okay. Was that kind of an outlier?

9 A I don't really understand what you mean by
10 that.

11 Q Okay. And a trick paying 5,000 and then
12 \$15,000 for two days' time with you, did that
13 happen often?

14 A No, it didn't.

15 Q Did it happen more than one time?

16 A Yes, it did.

17 Q Okay. Did it happen more than one time
18 with the same buyer?

19 A Yes, it did.

20 Q With the same john?

21 A Yes, sir.

22 Q Okay. Where was he?

23 A In Birmingham. I was in Bessemer jail and
24 he sent [REDACTED] \$10,000 to help get me a lawyer,
25 and [REDACTED] never did. He just let me sit there.

1 Q What's his -- do you know his name?

2 A I don't remember it, no, sir.

3 Q Okay. Any other pictures you remember
4 looking at before your deposition?

5 A No, sir.

6 Q This 1GG business name of [REDACTED] --
7 first of all, is that how he would say it, 1GG?

8 A Yes.

9 Q Do you know, does that -- does that stand
10 for something or is that just the name?

11 A It stands for 1 gone give. So it was his
12 way, I guess, of saying you make anything out of
13 nothing, and that's pretty much how he explained
14 it.

15 Q Okay. And I'm sorry. The first part of
16 what you said, I didn't quite catch. Something?

17 A You make something out of nothing.

18 Q And then you said -- did you say 1 gone
19 give?

20 A 1 gone give, yeah.

21 Q Like g-o-a-n, like gonna give?

22 A G-o-n-e and then g-i-v-e.

23 Q Okay. Outside of -- outside of making
24 women have sex with people in exchange for money
25 and taking that money, did [REDACTED] have any other

1 A No, sir.

2 Q Did you ever have a photo of his birth
3 certificate?

4 A Not from my recollection.

5 Q Do you know either of his parents?

6 A I'm sorry?

7 Q Do you know either of his parents?

8 A I met his mom before.

9 Q Do you know her name?

10 A Linda.

11 Q Do you know if he was born in Louisiana?

12 A Yes.

13 Q And then, as far as you know, did he grow
14 up in Houston?

15 A Yes.

16 Q Can you describe Mr. [REDACTED] to us?

17 A He is a skinnier side of the spectrum,
18 mini tattoos everywhere except for the face, black,
19 African American, brown eyes, a little bit on the
20 taller side. This is going to sound crazy, me
21 saying it, but a pretty smile, because he had a
22 pretty smile. Always very flashy, always wearing
23 diamonds.

24 Q How about facial hair?

25 A Yes, he has facial hair. It's like -- I

1 Q Where does he practice?

2 A I'm not exactly sure of the firm that he
3 works for right now. But I know it's pretty big
4 down in Miami.

5 Q It's in Miami?

6 A Yes, sir.

7 Q Okay. And he's [REDACTED] I guess, [REDACTED]

8 A Yes, sir.

9 Q Okay. And are [REDACTED] and [REDACTED] [REDACTED] and
10 [REDACTED] biological parents?

11 A Yes, sir.

12 Q Okay. You were telling us a minute ago
13 that you had a lawsuit offered to you or put in
14 front of you or you had an opportunity to
15 participate. How did that come about?

16 A I was -- I was talking about this one.

17 Q And how did -- how did this opportunity
18 come about?

19 A Oh, so I don't remember how far along
20 pregnant I was, but initially in 2018, my mom,
21 before she got really, really sick, was working
22 with a lady named Kimberly McDevitt. She worked
23 with Out of Darkness and also with Sunrise
24 Ministries. She pretty much helped, like, several
25 girls in a sense escape from the lifestyle. And

1 sheltered them, gave them, you know, clothes, jobs,
2 stuff like that, at the ministry place. And her
3 and my mother were good friends.

4 Well, one day when I was actually at that
5 Red Roof, Kimberly, my mom and a lady named Linda
6 Skolnitzky or Linda Caver, which is easier for me
7 to say it that way, they were --

8 Q Linda -- I'm sorry, what was the last
9 name?

10 A Linda Caver. It might be like Skolnitzky
11 in y'all's paperwork, but her last name is Caver.

12 Q C-a-v-e-r?

13 A C-a-v-e-r, uh-huh. But Linda, she was, I
14 guess, doing ministries with Kim and my mom that
15 day. Kim and my mom were at the building to the
16 back of the place, and we were in the front.

17 [REDACTED] was in the shower, and Linda knocked on my
18 door.

19 And at the time, I thought that it was
20 somebody else, and she pretty much told me that she
21 knew who I was. And I didn't know who she was
22 and -- but a few months after that, sometime after
23 that, I eventually escaped from that. But in that
24 same situation, that's also where I met Kim, who
25 was doing the ministries with my mom.

1 know, find an association or an associate of
2 [REDACTED] to post an ad, and that's what we did,
3 and essentially things went wrong. [REDACTED] and his
4 friend had left me there because, I guess,
5 [REDACTED] trust level with me had went up. Had me
6 so scared I wasn't even going to leave.

7 Q So he left you at the house with the john?

8 A And with -- yeah, yeah. He told me to do
9 my thing and run the house full of tricks, and I
10 did. And one trick came in, and he tried to rob
11 me. And he ended up -- he chained me up against
12 the bed that was in the basement, and he raped me
13 three times. And when I tried to kick him off the
14 fourth time, he pulled out a small gun and shot it
15 by my head. And then he said, "The next one is
16 going to go in your dome if I don't get what I
17 want."

18 And he took everything that I had that day
19 that I made, including a little bit of my sanity.

20 Q Do you know who that john is?

21 A No, I don't.

22 Q And so at this house, before this
23 happened, [REDACTED] -- you okay?

24 A (Witness nods head.)

25 Q Okay. [REDACTED] left you and said, "Do your

1 thing," which to you meant service these multiple
2 johns who are going to come through today, correct?

3 A Yeah.

4 Q And did you, in fact, have sex with
5 multiple people that day?

6 A Yes, I did.

7 Q Okay. And then they paid you money for
8 it?

9 A Yes, sir.

10 Q Okay. And then later, this guy comes
11 along who first tried to rob you, but then tied you
12 up and then raped you and then did rob you?

13 A Yes, sir.

14 Q And he took the money that you had made
15 from the other johns earlier that day?

16 A Yes, sir.

17 Q Between 2012 and September of 2018, did
18 anybody else rape you?

19 A Yes.

20 Q How many other times did that happen?

21 A Too many to count. It was always
22 something wrong with either me or the vagina wasn't
23 good enough, so they wanted something extra, or,
24 you know, they wanted to have uncovered and knew I
25 wasn't a girlfriend experience type of girl. And

1 so they would just rape me raw instead. And some
2 of them were just so big, you can't even fight them
3 off. You do everything you can, and you just lose
4 power to fight, so you just sit there and let it
5 happen.

6 Q And then those guys wouldn't leave any
7 money?

8 A No. They would take back what they left
9 on the counter and tell me that it was a waste of
10 their time so they're not paying for it.

11 Q And where was [REDACTED] during these times?

12 A Always around, but never back in time.
13 And then I would get my ass whooped for it because
14 it was my fault because I didn't do something right
15 or I didn't give them what they wanted instead of
16 just going along with it. It was damned if I do,
17 damned if I don't. If I don't get extra for
18 whatever they want, then I get beat up. If I don't
19 do it, then I get beat up. It was always just
20 that.

21 Q Did -- [REDACTED] did he beat you after
22 every trick?

23 A No.

24 Q But multiple times?

25 A Yes, sir.

1 wallet and his pants and run out of the room," you
2 know. And Lord knows I tried that. I tried that,
3 and never ended well at all for me, you know, or me
4 trying to, I guess you could call it an escape, me
5 trying to find attention or something a different
6 way. I don't know really what it was I was looking
7 for. But if I was talking to a high school guy
8 friend from Instagram or something, like, he would
9 be like, "Why are you talking to him," you know.
10 And like --

11 Q [REDACTED] would say that?

12 A Yeah, like, just flip out. And, like, you
13 know, tell me he would kill me, like, if I ever
14 left, and it was just always lies. It was always
15 lies. And he would tell you what -- he'd tell you
16 what you want to hear. And he was so good at it,
17 you just believed it. You believed it. You
18 believed it and you were scared.

19 Q Is it your belief, Ms. [REDACTED] or your
20 contention that every time you engaged in a sex act
21 for money between 2012 and 2018, that those were
22 all rape?

23 A What do you mean?

24 Q Well, you've told us that you were raped
25 too many times to count, I believe is what you

1 Q All right. [REDACTED], we talked about
2 her earlier, similar circumstances as Ms.

3 [REDACTED] correct?

4 A Yes, sir.

5 Q All right. And again, she and the
6 nickname Brooklyn, that's the same person?

7 A Yes, sir.

8 Q All right. So we could combine Ms. [REDACTED]
9 and Brooklyn in this table?

10 A Yes, sir.

11 Q Okay. All right. And Cherry, it says,
12 "Cherry is a victim of sex trafficking who was
13 trafficked along with E.H. at some of the same
14 hotels. She is deceased and may have died around
15 2017."

16 Are Cherry and Duck the same person?

17 A No. Cherry is different. I do remember
18 Cherry, too. Cherry was 17.

19 Q When?

20 A She was there during the time when we
21 first started going to the Red Roof. One of
22 [REDACTED] homeboys had brought her to him
23 essentially in a trade. But when [REDACTED] found out
24 that she was 17, he wanted nothing to do with her.
25 He didn't want to be -- you know, you're already

1 doing one crime, why do another one with a minor,
2 you only make it worse, right? Apparently not.

3 But he told his friend pretty much that,
4 like, I don't want anything to do with this girl,
5 you need to get her away from me as far as
6 possible, as quickly as possible, and he did. He
7 ended up trading her to a trafficker a few doors
8 down from us. And every time that I would see her
9 come out of the room, whenever we were there or if
10 she was there, she would always have, like, bruises
11 on her. You could tell she was always being
12 beaten. She just was never really in good shape.

13 Q Can you describe Cherry to us --

14 A She was --

15 Q -- physically?

16 A She was very petite, very, very little.
17 Shorter than me. She had cherry red hair is
18 probably the reason why we named her that. Well,
19 not we, but that's what she said her name was.
20 Very high-pitched voice. Caucasian. I don't
21 remember if her eyes were blue or green. But very
22 pretty. Bad that she died so young. But that's
23 really all I remember about her.

24 Q Do you know who she was traded to?

25 A No, I don't. We were -- we weren't

1 Q All right. Let's go up a step. There's
2 somebody listed with the identifier of
3 "Housekeeper," do you see that?

4 A Uh-huh.

5 Q And then in the description, it says,
6 "E.H. recalls interacting with a housekeeper who
7 was skinny and missing several teeth while being
8 trafficked at the Smyrna Red Roof Inn. Ms. [REDACTED]
9 recalls that the housekeeper would bring her stacks
10 of towels, on average three times per day, during
11 her trafficking."

12 Do you know who this housekeeper
13 description is referring to?

14 A Yes, I do.

15 Q Tell me about him or her.

16 A So she was probably definitely on drugs.
17 She looked like a crack addict. And probably still
18 on the pipe. So if you ask me, she wasn't all the
19 way there. She was very fidgety. Very -- really
20 quick movement.

21 But when I saw her, she would always ask
22 me like, "Hey, do you need anything?"

23 And if I tell her no, then she would, you
24 know, leave me alone. But if I was like, "Yeah, I
25 need some towels" or something like that, then she

1 would bring me what I needed.

2 And, you know, she would just be like,
3 "Hey, just call me if you need anything else."

4 You know, she was very laid back. Very
5 chill. Didn't talk much. And that was really it.
6 If we needed something cleaned up or something,
7 then she would -- she would do it.

8 Q Can -- I'm sorry. Were you finished?

9 A No, I'm done, I'm done.

10 Q Can you describe any more physically,
11 height, weight, race, appearance?

12 A So she was African American. She had
13 black hair, more on the stringy side. If you call
14 it a ponytail, then sure, it looked more like a
15 twig. Definitely the gapping teeth. She was
16 missing a crap ton of teeth. Like I said, I think
17 she was definitely either just off or still on
18 crack.

19 Q How tall was she?

20 A She wasn't much taller than me. I'm
21 5'5 1/2". She wasn't that much taller than me, but
22 she was very, very little, like it was crack.

23 Q You've seen that before?

24 A Yes.

25 Q Okay. And she would -- this housekeeper

1 would always be asking if you need anything, and if
2 you did, she would bring it to you?

3 A Yes.

4 Q I mean, it sounds to me like she was doing
5 her job; is that how you saw her?

6 MR. BAUMRIND: Object to the form.

7 BY MR. REAM:

8 Q Well, let me -- let me reask it.

9 When you asked her for towels, would she
10 bring them to you?

11 A Yes.

12 Q When she came by and asked if you needed
13 anything and you told her what you needed for the
14 room, would she bring those things?

15 A Yes.

16 Q Did you ever tell this housekeeper what
17 you were doing at the hotel or being forced to do?

18 A No, but --

19 Q Did you ever tell this housekeeper --

20 MR. BAUMRIND: Let her finish.

21 A No, but she would always ask -- well, not
22 even so much ask. She would say, "You're making
23 some good money today, huh?"

24 And then she would walk around with a
25 smirk on her face after walking away. So no, I

1 don't think she was just doing her job because just
2 going your job at a hotel with towels is once a
3 day, not three to multiple times a day.

4 BY MR. REAM:

5 Q Have you ever worked at a hotel?

6 A Yes, I have.

7 Q Which hotel?

8 A Hilton.

9 Q When was that?

10 A This was 2019.

11 Q Okay. And you were at the Red Roof
12 Inn before 2019?

13 A Yes.

14 Q What did you do at the Hilton?

15 A I was part of the restaurant crew. I was
16 also part of the to-go room service. If they
17 needed me to float and go help with laundry, I
18 helped with laundry. If I needed to do a pick up,
19 I did a pick up. I restocked the staff room.

20 Q Hang on one second. I'll let you keep
21 going. What's a pick up?

22 A So like old trays, dishes, to-go boxes
23 that have been put outside the rooms, any linen
24 towels, stuff like that, only gets picked up once a
25 day at the Hilton. Just all like the simple

1 A Yes, sir.

2 Q Did you ever tell any other -- or any
3 housekeepers at the Red Roof Inn Smyrna that you
4 were having sex in exchange for money or being
5 forced to have sex in exchange for money while
6 there?

7 A No, sir.

8 Q Did you ever tell anybody who worked at
9 the Red Roof Inn Smyrna that you were having sex in
10 exchange for money at the hotel or being forced to
11 have sex in exchange for money at the hotel?

12 A Yes, sir.

13 Q Who all did you tell?

14 A So I didn't -- it wasn't that I was being
15 trafficked. It was more so that my services were
16 available. And there were two security guard
17 officers at the hotel, and I believe they're also
18 on this list. One of them I did not -- do not know
19 his name, but he was on the night shift. And the
20 other one was on the morning shift who at the time
21 I was understanding his name was Marcus. And he
22 would always keep a lookout and, you know, come see
23 me. He would come stop by for a quick fix, and
24 keep it -- keep it moving, both of them really.

25 But the one that was -- at the time, I

1 thought his name was Marcus, he would always just
2 keep me very well-informed, especially at night,
3 especially when he was there just in general.
4 Like, you know, they're doing rounds or the police
5 are around the corner or, you know, you have
6 another group of girls coming in, like, people
7 would always just look out for those things and
8 always keep us posted.

9 Q All right. So I think what I asked you
10 was, did you ever tell anybody who worked at the
11 hotel that you were being forced to have sex in
12 exchange for money there, and you said no, but you
13 told two security guards that your services were
14 available?

15 A My services -- yes, sir.

16 Q Okay. And what did you mean by that?

17 A So I was open for business.

18 Q Meaning what?

19 A If they wanted to see me, they could, and
20 to tell their friends about me.

21 Q And they would have to pay you?

22 A Yes, sir.

23 Q And you told that to two security guards
24 at the hotel?

25 A Yes, sir.

1 physique?

2 A Huh-uh.

3 Q No?

4 A No.

5 Q Okay. And similar to what you told us
6 about your discussions or conversations with
7 Marcus/Jay, did you tell this other security guard
8 that you were open for business, as you said?

9 A Initially, I did, and he shot me down.
10 But I believe that he had a conversation with
11 Marcus/Jay, and I guess that changed his mind.
12 After -- I saw them talking one day during a shift
13 change, and after that, he actually approached me
14 and he was like, "Hey, you still open," and we --
15 yeah.

16 Q Going back for a second with Marcus a/k/a
17 Jay, those three or four times, where did y'all
18 have sex?

19 A It was in a room at the Red Roof.

20 Q Those three or four times, did it occur in
21 the same room at the Smyrna Red Roof or different
22 rooms?

23 A It was different rooms.

24 Q All right. Coming back to this second
25 security guard, name unknown, did you ever engage

1 in sex with him in exchange for money?

2 A Twice.

3 Q Okay. Where did that occur?

4 A It was in the room that I had at the time.

5 Q And do you remember when?

6 A I don't.

7 Q Let me see how I can ask this. Was it --
8 was the first time you had sex with the security
9 guard after the last time you had sex with Marcus?

10 A I don't remember.

11 Q Okay. Do you believe it was around 2015
12 with this second security guard as well or some
13 time otherwise?

14 A It might have been. I don't really
15 remember. I think --

16 Q When you --

17 A Sorry. I think that's the moment where,
18 like, the time frame starts, like, colliding
19 together. I just -- it's all like mush.

20 Q When you saw this second security guard,
21 not Marcus, at the Red Roof Inn, was he similarly
22 in an all black uniform that said security?

23 A Yes, sir.

24 Q Did he also wear a hat?

25 A I don't think he wore a ball cap, but I

1 Q That other one typically worked the day
2 shift?

3 A Yes, sir.

4 Q Okay. Those security guards, were they
5 armed security guards or unarmed?

6 A I don't remember. I don't think I really
7 paid attention to that.

8 Q Okay. Next up on this list there's
9 somebody identified as, quote, husband of the
10 owner. Do you see that?

11 A Yes, sir.

12 Q Do you know somebody as the, quote,
13 husband of the owner who knows about your
14 allegations of sex trafficking?

15 A I don't know if he knows the allegations,
16 but I do remember discussing this person.

17 Q Okay. Who is this person?

18 A The husband of the owner.

19 Q And the owner of what?

20 A The Red Roof.

21 Q All right. So this is a man?

22 A Yes, sir.

23 Q Okay. Do you know his name?

24 A No, I don't.

25 Q Can you describe him?

1 A He was a bit taller, slightly lanky.
2 Usually seen him he had a button-down on, some form
3 of dress pants and dress shoes. He was more of an
4 Indian descent. Shorter, clean-cut hair.

5 Q Light skinned, dark skinned, medium?

6 A More on the lighter side.

7 Q And you said a bit taller. A bit taller
8 than what or who?

9 A Shorter than you.

10 Q Shorter than me, okay.

11 A Yeah.

12 Q A bit taller than you yourself?

13 A Yeah.

14 Q Okay. Somewhere between your height and
15 my height?

16 A Yeah. Probably like in the middle.

17 Q Okay. How tall are you again?

18 A 5'5 1/2".

19 Q Okay. Anything else you can remember
20 about his appearance?

21 A No. He had a thick accent, but that was
22 honestly probably about it. But other than that,
23 no.

24 Q And you said slightly lanky?

25 A Yeah.

1 Q So kind of tall and skinny?

2 A Yeah.

3 Q Kind of like me?

4 A Yeah.

5 Q Okay. You can say it.

6 A Sorry.

7 Q Okay. How about facial hair?

8 A I never saw him with any.

9 Q Clean shaven?

10 A Yes, sir.

11 Q Okay. Any tattoos, scars, markings you
12 can remember?

13 A Not that comes right away, no.

14 Q Did he wear a hat or any kind of head
15 covering or turban or anything like that?

16 A No, sir.

17 Q Glasses, no glasses?

18 A I never saw him with any.

19 Q Tell me about your conversation or
20 conversations with this individual wherein you came
21 to know him as the husband of the owner. How did
22 that come up?

23 A So initially, [REDACTED] would have gotten
24 the room initially with -- I believe he was at the
25 front desk.

1 Q "He" who?

2 A The husband of the wife -- the husband of
3 the wife? Of course. The husband of the owner.
4 Sorry.

5 Q Okay.

6 A And I believe at one point [REDACTED] had
7 either went downtown or I think he went to go take
8 one of the girls on a outcall. And I had went to
9 Target, and I'm pretty sure I saw the husband of
10 the owner and another Indian guy out there talking.

11 Q Outside of Target?

12 A Outside of the Red Roof.

13 Q Okay.

14 A And when I was talking -- when they were
15 talking, I had walked by. Well, I had a trick that
16 was outside. And I'm pretty sure that the husband
17 of the owner had said something to the trick like
18 he couldn't be parked there, for whatever reason,
19 because he had never seen him before or something
20 like that. He hadn't had a room key. He was just
21 saying something to my trick basically.

22 And so I saw my trick. Well, later on, I
23 was walking my dog who was Boss at the time, and
24 I'm pretty sure he was out there at that time and
25 was like, "You know, you can't really be walking

1 the dog outside. Like you need to make sure you
2 pick up the poop." And so that was our first
3 actual, like, interaction.

4 The next morning, [REDACTED] had to go help
5 [REDACTED] out with a few things, so I ended up having
6 to go pay for the room. And I guess [REDACTED] had
7 said something to him as well. And he also at one
8 point pretty much called me, I guess, through one
9 of the lists, the websites that I had posted on in
10 between that.

11 And when I started paying for the room, he
12 would give me a key, and -- you know, with a room
13 number on it. And I would get, like, instructions
14 to meet him at a room, and he would pay me like
15 \$300 for that one visit. And we would have our
16 visit. And sometimes he would, you know, just talk
17 about the different conversations, like the
18 different problems in his areas of his life.

19 And when I asked him at one point, you
20 know, why he was having so many problems with his
21 wife, it was basically the conversation -- the
22 conversation was basically about that she was,
23 like, controlling the place a different way than he
24 wanted it to.

25 I mean, I really don't remember much after

1 that. I do know that most of the times we met, it
2 was always through a card similar to the security
3 officer.

4 Q It was through a card?

5 A Like the room key, like we would get the
6 room key -- I would get the room key, and we would
7 go to the room.

8 Q Okay.

9 A He would, like, tell me, like, either what
10 time or what day to come.

11 Q Okay. What I want to know is: How did
12 you come to believe or learn that he was a husband
13 of the owner?

14 A That's what he said.

15 Q He said, "I'm the husband of the owner"?

16 A Yeah. But he -- I never saw really a
17 female working down in the front, so to me, that
18 also didn't really make sense.

19 Q But that's what he told you?

20 A Yes, sir. It's kind of like the corporate
21 buyer. I mean, they both say one thing, but you
22 really don't know.

23 Q Well, I -- and I'm just wanting to know
24 what you know or believed at the time. So I guess,
25 tell me -- I'm missing a step, I suppose, in

1 whatever sex act he paid for?

2 A Yes, sir.

3 Q At the time, whenever it was between 2014
4 and 2018, that you were interacting with this man,
5 at that time, did you believe that he was a husband
6 of the owner of the hotel?

7 A I don't know what I believed because I was
8 really just trying to get the money so that I could
9 get [REDACTED] off my back.

10 Q How about now, do you sitting here now
11 believe that that man was a husband -- or the
12 husband of the owner of the Smyrna Red Roof Inn?

13 A Probably not.

14 Q And you said he mostly wore a button-down;
15 is that right?

16 A Yes, sir.

17 Q Did he wear anything that said Red Roof?

18 A I don't remember.

19 Q Did you ever -- did you ever see him
20 behind the desk in the front office?

21 A Yes.

22 Q Did you ever hand him money for a room at
23 the front office?

24 A Yes.

25 Q Did you ever hand him your ID in the front

1 individual more than once in a day?

2 A No.

3 Q Okay. That being the case, how many total
4 days or interactions with this individual did you
5 have where you had sex with this individual? Is it
6 between two and five?

7 A Yeah.

8 Q Okay. Were there times when -- it goes on
9 into here in page 13 and says, under the general
10 description, "He would also warn E.H. if he
11 suspected a sting operation at the Smyrna Red Roof
12 Inn."

13 Do you see that?

14 A He would call, call the room.

15 Q Let's start with this. Do you see it on
16 the page?

17 A Oh, yes, sir.

18 Q Okay. All right. Were there times when
19 this individual told you about his suspicions of a
20 sting operation?

21 A Yes, sir.

22 Q When did that happen?

23 A So depending on when he was there, if
24 there was suspicions, we would get a call either
25 early in the morning or, like, middle of the

1 afternoon. If I wasn't the one to answer the
2 phone, then [REDACTED] was.

3 Q Did this individual ever call you and say,
4 "Hey, I think," something to the effect of "I think
5 there's going to be a sting" or "I have suspicions
6 about a sting operation"?

7 A I believe I got one call from him.

8 Q One call?

9 A Yes, sir.

10 Q Okay. What do you remember from that one
11 call?

12 A I just remember somebody saying to watch
13 your back, and there was a dial tone.

14 Q You say somebody said that. Do you know
15 who it was?

16 A It sounded like his voice, so I assumed it
17 was his.

18 Q Okay. And that somebody that you believed
19 was this man --

20 A The husband of the owner.

21 Q -- who called himself the husband of the
22 owner, he said, "Watch your back"?

23 A Yes, sir.

24 Q And then hung up?

25 A Yes, sir.

1 we'll understand those were times when you had sex
2 with individuals in exchange for money or something
3 of value and not -- not while under the control of
4 any pimp or trafficker; is that fair?

5 A Yes, sir.

6 Q Okay. When have you, Ms. [REDACTED] engaged
7 in independent work?

8 A There was a very short, short time frame.
9 I'm not exactly sure on exactly how long that time
10 frame was. There was a moment where I got
11 arrested, and when I had gotten out, it was -- they
12 sentenced me with probation, so I got out, and I
13 didn't call [REDACTED] So instead I ended up -- I
14 don't remember how I met her, but I ended up
15 meeting this girl, and me and her messed around a
16 few times and --

17 Q Like you two slept together?

18 A Yes, sir.

19 Q Okay.

20 A And on April 20th, we were at a hotel in
21 Lawrenceville, and we were smoking. And eventually
22 the police pretty much knocked on our door, and we
23 went to jail that day.

24 And I had a bond. With that bond, I
25 didn't know really who else to call. I was too

1 ashamed to call my mother. And to be quite frank,
2 I mean, mentally, I didn't want to go home. I was
3 very addicted to cocaine at the time.

4 So what I did was I called [REDACTED] and he
5 came and bonded me out. Had a sack of cocaine with
6 him, and he gave it to me. And when he, you know,
7 gave it to me, I went right back. And so that
8 short time frame ended from my independent work.

9 Q Okay. And I know at one point you said
10 this was around April the 20th. Do you know what
11 year?

12 A I don't remember what year. I know
13 there's a, I believe, arrest record that you guys
14 already have from April 20th, but that's -- it
15 should have, I guess, the year on it.

16 Q And what were you charged with at that
17 time?

18 A I think it was obstruction, possession of,
19 like, a straw or something, I think, with cocaine
20 residue on it.

21 Q What about possession of marijuana?

22 A I think I had that, too.

23 Q It was 420, right?

24 A Yes, sir. It was -- it was -- yeah, the
25 date was actually 4/20.

1 Q And who was that other woman?

2 A [REDACTED]

3 Q How do you spell it?

4 A I think it's [REDACTED].

5 Q Do you know her last name?

6 A K. I'm not actually sure of the actual
7 last name.

8 Q Have you ever heard the last name [REDACTED]
[REDACTED]

10 A Yeah, yeah.

11 Q Do you believe that's her?

12 A Yeah.

13 Q Okay. And so I guess you were telling me
14 about the short time frame in which you did some
15 independent work. So -- and it sounds like it
16 happened when -- during a period when you bonded
17 out from jail, you didn't go back to [REDACTED] you
18 met up with this girl, [REDACTED] and the two of you
19 hooked up, but then did you also have sex with
20 other people and receive money?

21 A It was just one day. I did it for, like,
22 literally one day.

23 Q Okay. And during that one day, did you
24 have sex with other men and they paid you?

25 A Yes, sir.

1 A Yes, sir.

2 Q Okay. And tell me what you remember about
3 getting to and arriving at the Drury Inn.

4 A So we get there, and it's [REDACTED] or [REDACTED]
5 whatever her name is, and I think, like, I think
6 [REDACTED] was there, too, and [REDACTED] was there. And
7 they were like -- the girls were, like, doing their
8 makeup and stuff.

9 Q In a room?

10 A Yeah.

11 Q In a guest room?

12 A Yes, sir.

13 Q Okay.

14 A And then I think -- I believe that [REDACTED]
15 was constantly answering her phone, like it was
16 constantly ringing. And every time it would ring,
17 she would be like, either walk out of the room or
18 she would walk into the bathroom, you know, just
19 somewhere secluded where she could clearly take her
20 conversation wherever she needed to, I guess.

21 Q Right.

22 A And so I had saw [REDACTED] and I met him,
23 and we, you know, introduced ourselves or whatever.
24 And so he gave me a dress. And so I put the dress
25 on, and [REDACTED] came out, she did my makeup, she did

1 my hair. And we took a few pictures and --

2 Q In the guest room?

3 A Yeah, in the -- in the room. And, I mean,
4 to be completely honest, that's really all I, like,
5 remember. All the rest of it is pretty much a
6 blur.

7 We took pictures. And, I mean, I don't
8 really remember what happened the rest of that day.
9 I know we came back, me and [REDACTED] we came back
10 when [REDACTED] was no longer there. I think they had
11 went on a outcall or something like that.

12 Q At some point, [REDACTED] left?

13 A Yeah, yes, sir.

14 Q Okay.

15 A I think -- I think me and her ended up
16 both having sex with [REDACTED]

17 Q That first day?

18 A Yeah, I believe we both had sex with him.

19 Q How did that come about?

20 A I don't remember. I don't remember.
21 Like, I really don't remember.

22 Q Were there any drugs that first day?

23 A Alcohol, there was lots, lots of alcohol.

24 Q Okay.

25 A I was very stiff during the dress shoot.

1 And [REDACTED] had given me some alcohol to, I guess,
2 help loosen me up and...

3 Q And at some point, you believe that you
4 and [REDACTED] both had sex with [REDACTED] at the Drury
5 Inn?

6 A Yes, sir.

7 Q Okay. And then at some point that same
8 day, you and [REDACTED] left?

9 A Yes, sir.

10 Q And you went back to your mom's house?

11 A I honestly don't remember where I went
12 back to. But I know we eventually went back when
13 [REDACTED] was no longer there and had sex with him and
14 then we left. I don't -- yeah, I don't literally
15 remember at all where I went to --

16 Q Okay.

17 A -- after that.

18 Q How long after that first encounter with
19 Mr. [REDACTED] and then you left with [REDACTED] did you
20 then see him again?

21 A I think I did one more shoot with him.

22 Q When?

23 A I think it was like the next day or the
24 day after maybe. I'm not sure 100 percent.

25 Q That second encounter with Mr. [REDACTED] did

1 you have sex with him that second day -- or second
2 time?

3 A Not initially.

4 Q What does that mean?

5 A I got drunk, and when I drink too much, I
6 get giddy. And I thought that he was showing
7 interest, like sincere interest in me, I guess. I
8 remember he was making me feel very pretty. And
9 so, you know, we did end up having sex.

10 Q That day that you saw him the second time?

11 A Yes, sir.

12 Q Okay. When you said "not initially," you
13 just meant not the moment you first saw him on the
14 second time?

15 A I mean, he -- it took him, like, a few
16 hours --

17 Q I see.

18 A -- for me to actually give in. Like, I
19 felt out of place. I didn't understand what was up
20 with the phone calls. You know, everything was
21 very secretive.

22 And at the time, I -- you know, I wanted
23 an escape from home. I wanted an escape from the
24 pain from, like, past me had already endured. And
25 every time I was at Paula's house, that's all I

1 saw. So I didn't want to be there anymore. So in
2 a sense, you could say that the one handsome person
3 that showed me affection, showed me attention, made
4 me feel good, I was the guinea pig and I fell for
5 it.

6 I -- you know, I keep on saying it, and
7 I'll just say it again, I was cracked like hell
8 when I went in to sex trafficking because of the
9 traumatic experiences I had as a child. But being
10 trafficked broke me in ways that I will never be
11 able to, like, verbally explain all the way around.

12 But that moment, I saw the opportunity, I
13 saw the escape, I saw an option that maybe somebody
14 actually cares about me and maybe he'll actually
15 love me, and so I ran with the idea. And next
16 thing I know, I'm making dates.

17 Q Where did you see Mr. [REDACTED] the second
18 time?

19 A It was the Drury Inn.

20 Q The Drury Inn again?

21 A (Witness nods head.)

22 Q And how long after that second time were
23 you -- did you have a trick and a date?

24 A Probably within a week.

25 Q So tell me what happened in that probably

1 week or so when you went from just taking sexy
2 photos, I'm having some drinks, I'm having sex with
3 this guy who seems to be showing interest in me, to
4 now I'm going to be having sex with other people?

5 A Can you -- can you rephrase that for me,
6 please?

7 Q Sure. What I'd like to know is what
8 happened or transpired in that week or so wherein
9 you went from seeing [REDACTED] at the Drury Inn and
10 you had sex with him and you told us you felt like
11 he was showing genuine affection towards you, and
12 you were responding to that, to then about a week
13 later, you're seeing a trick, you're going on a
14 date, you're having sex with somebody else for
15 money? How did things evolve to that?

16 A There was that small window, people were
17 buying my pictures on some website, I don't even
18 know what it was, like genuinely buying my photos
19 of just me, like, sitting in a chair. And I had no
20 idea that's what he was doing at first. You know,
21 we were just, like, hanging out, and we would smoke
22 a blunt.

23 Q You didn't know he was selling the photos
24 he took of you?

25 A No, I didn't.

1 Q When [REDACTED] told you that she knew a way
2 that you could have fun and make some money taking
3 sexy photos --

4 A I thought --

5 Q Hang on. Just what did you understand
6 that to mean?

7 A I thought that he would take photos of me
8 and pay me for them, not, you know, sell them to
9 somebody else. It's different if you're putting it
10 in a art gallery, you know, full of naked women,
11 but not just some random -- not -- you tell me; you
12 know, you don't hide it.

13 Q So you thought you -- that just [REDACTED]
14 was going to pay you for the opportunity of taking
15 photos of you; is that fair?

16 A Yes.

17 Q Okay. Not that he would then sell them,
18 other people would pay for them, and then that
19 would be how you got paid?

20 A Right.

21 Q Did you take any photographs on that
22 second encounter with Mr. [REDACTED]

23 A No, it was all sex.

24 Q In the first encounter where you did take
25 photos with Mr. [REDACTED] was he the one who took the

1 photos?

2 A Yes.

3 Q Were there any other men there?

4 A No, sir.

5 Q Did you take any photos naked that first
6 time?

7 A Yes, I did.

8 Q Okay. All right. And so in that week or
9 so that you were telling me after the second
10 encounter with Mr. [REDACTED] was he giving you money?

11 A Yes, he was, but it wasn't a lot.

12 Q But it wasn't, I'm sorry, what?

13 A It wasn't a lot.

14 Q It wasn't a lot, okay. And he said that
15 that money was from people buying your photos?

16 A Yes.

17 Q From some website?

18 A Yes.

19 Q All right. Let's keep going with the
20 story. So how did it go from now he's paying you
21 some money and then how does that evolve into you
22 seeing tricks?

23 A He -- after -- on that second day, we're
24 laying in the hotel room bed, and he says to me, he
25 says, "I know this big guy down in Birmingham, and

1 he's known really, really well." He says, "If I
2 tell you to take a trip with me, would you do it?"

3 And I was like, "Yeah. I mean, you know,
4 like, what am I getting out of it, you know what I
5 mean? Like what -- I barely even know you, but I'm
6 like, what am I, you know..."

7 And he says, he says, "Don't worry, the
8 money will be worth it."

9 And so I was like, "Okay. But it's still
10 so far away. I was like, let me -- let me talk to
11 my mom and see what she thinks, right?"

12 And so I did. I eventually talked to my
13 mom, but I told her it was a modeling thing
14 because, in a sense, that's what I thought it was.

15 Q In another sense, did you not think that
16 she would approve of you going to Birmingham with
17 some guy you just met?

18 A She probably would have disagreed. But we
19 all have our demons.

20 Q Yeah. You were also an adult at that
21 time, right?

22 MR. BAUMRIND: Object to the form.

23 A My mom thought I was a very pretty girl.
24 So any opportunity to exploit that prettiness as an
25 adult, she would have wanted me to go for it.

1 A Yes.

2 Q -- all in the Hoover, Birmingham, area?

3 A Yes.

4 Q All right. What happened next?

5 A So he's gone.

6 Q "He" being [REDACTED]

7 A Yeah, yes, sir. We -- he had dropped me
8 off at the hotel. He was like, look, I'll be back,
9 I got to go handle some business. And I asked him,
10 like, you know, why couldn't I be in the room with
11 the other girls?

12 And he was like, "We'll talk about it
13 later."

14 And I was like, "Okay, that's really
15 suspicious. You know, like, that doesn't really
16 make sense."

17 So I ended up calling my mom, you know,
18 and I was crying to her because I was like, dang,
19 like, I'm all the way out here, and I think -- now
20 I'm starting to think, like, it's kind of a scam.

21 And he comes back or whatever, probably
22 like an hour or two, and I had done finished my
23 conversation with my mom. And, you know, he -- I'm
24 just going to say he seduced me because, I mean, in
25 a -- in a sense, he really -- no, he really did.

1 He comes back -- he comes back and what he called
2 it was made love, but that -- that wasn't love.
3 That wasn't love.

4 And he asked me, he says, "Hey, if I ask
5 you to do something, will you do it?" It's always
6 how he got me, just every time, "Hey, if I ask
7 you -- if I ask you for something, will you do it?"
8 It was like his logo.

9 And I was like, "It depends on what it
10 is."

11 Q Fair response.

12 A And he was like, "So the big guy I told
13 you about wants to know if he paid you, would you
14 have sex with him?"

15 And I said, "I don't know about that.
16 That's a bit of a stretch. Like, you know, you and
17 I having sex, like, that's weird, you know what I
18 mean? Like I'm not, like, an everybody type of
19 girl."

20 And he was like, "You like me, right?"

21 And I was like, "Of course, I like you,
22 you know what I mean? Like clearly I like you or
23 else I wouldn't be here."

24 He was like, "How much?"

25 And I was like, "A lot," you know.

1 And so he goes and gets a bottle of
2 liquor. He comes back. We start taking shots. We
3 have sex again. And as he's holding me and kissing
4 me on the back of my neck, he says, "So how about
5 it? You going to do it?"

6 And I said, "Yes." I said, "Yes."

7 And the moment I did it, and I asked him
8 why he was asking me for the money, he beat me. He
9 beat me so bad. And then I knew exactly what I
10 signed up for.

11 MR. BAUMRIND: Can we take a break? Let's
12 take a break.

13 MR. REAM: All right. Let's take a quick
14 break, Ms. [REDACTED]

15 THE VIDEOGRAPHER: Off the video record at
16 4:58 p.m.

17 (Recess from 4:58 to 5:25 p.m.)

18 THE VIDEOGRAPHER: Back on the video
19 record at 5:25 p.m.

20 BY MR. REAM:

21 Q All right. Ms. [REDACTED] when we left off,
22 we were talking about the time in which your sex
23 trafficking started. And it started in
24 Hoover/Birmingham, Alabama; is that right?

25 A Yes, sir.

1 Q Okay.

2 A I think it was a Hilton.

3 Q All right. And [REDACTED] said he wanted you
4 to have sex with people for money?

5 A Yes.

6 Q And you eventually agreed to that?

7 A Yes, sir.

8 Q Okay. And then you were telling us how he
9 beat you up. Did that happen before or after the
10 trick?

11 A It was after the trick. It was the big
12 boss guy from a modeling agency that he knew out in
13 Birmingham who wanted to pay to sleep with me.

14 Q Was he, that big boss guy, actually part
15 of any modeling agency, as far as you know?

16 A From my knowledge, yes. But after he
17 slept with me, he didn't -- wanted nothing to do
18 with me adding to his modeling agency.

19 Q So he slept with you just that one time?

20 A Yes, sir.

21 Q The very first trick you ever had?

22 A Yes, sir.

23 Q Or I guess the very first trick you ever
24 actually had sex with?

25 A Yes, sir.

1 Q Not counting the one at the Motel 6 where
2 things were sort of set up, but you never actually
3 had sex with him because the police came, right?

4 A Yes, sir.

5 Q All right. And so after you had sex with
6 this big boss guy in Alabama and -- do you remember
7 what he paid you?

8 A I don't.

9 Q Do you remember what sort of sex acts you
10 actually performed?

11 A Not really. I think it was just regular
12 intercourse.

13 Q Okay. And so did -- when you finished
14 with this big boss guy, did he hand you the money,
15 did he leave it on the table or nightstand or
16 something?

17 A It was the bedside table.

18 Q He left it on the bedside table, and then
19 that gentleman left?

20 A Yes, sir.

21 Q And did y'all have sex at that same hotel
22 where you were previously with Mr. [REDACTED] the -- I
23 think you believed it was a Hilton?

24 A Yes, sir.

25 Q Okay. Where did Mr. [REDACTED] go, if you

1 know, while you were with the big boss man?

2 A I have no idea.

3 Q He didn't stay in the room?

4 A No.

5 Q Okay. How long after the big boss guy
6 left did [REDACTED] come back?

7 A He came back about 15 minutes after I
8 had -- he had texted -- told me prior to meeting
9 with him, that once we were finished, to just
10 either call or text him once I was done. And to
11 make sure I had taken a shower and that I was clean
12 because he wanted me, too. And so I would take the
13 shower, and he would come back up, and when he came
14 in, I had already put the money up and --

15 Q Like in your purse or something?

16 A Yeah. I was like, you know, I just did
17 this, this is my tip.

18 Q This is my money?

19 A Excuse me. Yeah. And so when he comes
20 in, I see him, and I'm in -- I'm in a towel because
21 I'm like, okay, you know, he wanted me, too. So,
22 you know, this is -- that's why I did it in general
23 because I want to make him happy type ordeal,
24 right?

25 And he -- instead of giving me a hug or a

1 kiss or some type of the normal affection that he
2 had showed me previously, it was, "Where is my
3 money?"

4 And I just looked at him like, basically,
5 like, what? Like, you know, like, I was confused.
6 I didn't understand what he was asking me. And
7 when I asked him that, he pretty much grabbed me
8 and started hitting me in my abdomen asking me to
9 give him his fucking money because I got put on by
10 him. He put me on.

11 And so I -- after he was done beating me
12 up, I pretty much got up when he told me to get up
13 and he was done, and I got the money and I gave it
14 to him, and he walked out. He took it from me and
15 he walked out, and probably didn't come back for,
16 like, another two hours.

17 Q What did you do during that time?

18 A I took another shower. I sat in the tub
19 probably for about 45 minutes. I sat there until
20 the water literally was ice cold running over my
21 back. I was so confused.

22 And when I was pretty much getting out of
23 the shower, and I was about halfway dressed,
24 [REDACTED] walks back in. And he has this look in his
25 face, like, his -- like his face is no longer

1 hardened. It's, like, sad, like a grief struck
2 face. Like, you know, like, he saw me, it was like
3 damn, like, I hurt her type face. I don't really
4 know how to explain that. But, like, it was a look
5 like he felt bad, you know.

6 Q Okay.

7 A And he walks in, and he puts his arms
8 around me, and he grabs -- he grabs my chin, and he
9 makes me look at him, and he says, "I'm sorry," he
10 says, "can we try again?"

11 And I said, "Okay." I said, "Okay."

12 Q When you said okay to him asking, "Can we
13 try again," what did you understand him to mean at
14 that time?

15 A I thought he was talking about us. I
16 thought he was saying sorry for hurting me, but he
17 wasn't. He definitely wasn't.

18 Q Did you see other tricks that day in
19 Birmingham/Hoover?

20 A No.

21 Q Did you see any the next day?

22 A I don't -- I don't even remember.

23 Q Do you remember how long it was after that
24 first encounter with the big boss man, as you said,
25 that you then saw your next trick?

1 A I don't remember how soon after it was.
2 But I don't think it was that -- I don't think it
3 was that much longer afterward.

4 Q And was it still in Birmingham/Hoover
5 area?

6 A I think we had moved. I think that's
7 one -- I think we had moved to Tuscaloosa. It was
8 another, you know, few days of laying up and, you
9 know, telling me how sorry he was. And, like, he
10 was giving me hot baths and, like, putting ointment
11 on my bruises and, you know, like, trying to hurry
12 up and, like, heal me, I guess, so he could use me
13 again. That's how I look at it now, you know.

14 Q Sure.

15 A At the moment -- the moment that I was
16 healed, I mean, you know, it was the same thing.
17 It was, "Hey, babe, I got somebody else, you know."
18 "Hey, babe, I got somebody else." It was --

19 Q And by that, he meant he had another trick
20 for you?

21 A Yeah, yeah. And, you know, at one point,
22 I guess he had fed me with enough lies and he had
23 me wrapped around his finger without a doubt. I
24 did anything for him. It didn't matter what it
25 was; I would do it. I did, I did do it.

1 A Yeah. And I liked it a lot. And, you
2 know, I tried to hide it from my mom, and she
3 eventually found out about it, but...

4 Q Other than marijuana, did you ever use any
5 other drugs before your period of trafficking?

6 A No.

7 Q During your time period of trafficking,
8 were there drugs that you started taking -- we
9 talked briefly about cocaine, but were there other
10 drugs that you started taking besides marijuana?

11 A No, just the cocaine.

12 Q Just marijuana and cocaine?

13 A Yes, sir.

14 Q After your trafficking period ended, have
15 you used any other drugs?

16 A I have occasionally smoked marijuana. On
17 a daily, I smoke a Delta 10 pen. You can buy them
18 at the corner store, so it's legal. So in that
19 case, I guess it's not an illegal substance.

20 And to help me sleep at night and help
21 with my anxiety, I have a beer every night before I
22 go to sleep. But I think the normal American
23 drinks a beer at least once every night.

24 Q Other than marijuana and cocaine, did you
25 ever use any other drugs during your trafficking

1 period?

2 A Yes.

3 Q Okay. What others?

4 A When I could not find cocaine, I tried
5 Molly. I did Ecstasy. I tried crystal meth. I
6 took Percocets, pills. I mean, the only drugs that
7 I have actually never done is probably heroin and
8 crack cocaine.

9 Q Never had heroin and never had crack?

10 A Never. And I've never injected myself
11 with a needle.

12 Q Okay. You never injected any cocaine?

13 A Never.

14 Q Okay. Let me bring you forward in time.
15 What -- let me start again.

16 In those first few days when you were with
17 Mr. [REDACTED] in Birmingham and Hoover, and he started
18 making you have sex with people for money, did you
19 ever call your mom or call anybody for help?

20 A No.

21 Q During the period of your trafficking, did
22 you ever call any -- excuse me -- did you ever call
23 any 911 or police department for help?

24 A No.

25 Q Did you ever tell, during the period of

1 your trafficking, any doctors or medical providers
2 what you were being forced to do or subjected to?

3 A No.

4 Q During any of your court appearances
5 during your period of trafficking, did you ever
6 tell any judges or judicial staff that you yourself
7 were a victim and being forced to have sex with
8 people for money?

9 A No.

10 Q Did you ever tell any of your POs?

11 A No.

12 Q And did you ever tell any -- did you ever
13 tell any hotel employee at any hotel that you were
14 at during your period of trafficking that you were
15 being held against your will?

16 A No.

17 Q Did you ever tell any hotel employee that
18 you were being forced or threatened or coerced into
19 having sex with people for money?

20 A No.

21 Q Did you ever tell any hotel employee
22 during your trafficking period that you needed help
23 to get away from somebody?

24 A No.

25 Q Tell me what you can -- well, I want to

1 talk about the Smyrna Red Roof Inn. I think we've
2 got a sense of how things started and how things
3 ended. And I know you told us earlier that in some
4 time in 2014 is when you were first at the Smyrna
5 Red Roof Inn and had sex with somebody for money;
6 is that right?

7 A Yes.

8 Q Having sat here for a little while today,
9 any more concrete memories about when in 2014 you
10 were first at the Red Roof Smyrna?

11 A No, sir.

12 Q Okay. I want to ask you how many -- how
13 many times, how many different stays, have you had
14 at the Smyrna Red Roof Inn between whenever you
15 were first there in 2014 and the last time that you
16 were there under [REDACTED] control in September of
17 2018?

18 MR. BAUMRIND: Object to the form.

19 MR. REAM: Basis?

20 MR. BAUMRIND: Well, I don't know if the
21 definition of "stays" is clear. I think you
22 defined it previously, and that would maybe be
23 helpful so that she's giving an answer --

24 A Yeah.

25 BY MR. REAM:

1 Q Were there times you were at the Smyrna
2 Red Roof Inn for just one day, and then the next
3 day you went somewhere else?

4 A Yes.

5 Q Were there times you were at the Smyrna
6 Red Roof Inn for more than one day?

7 A Yes.

8 Q And between 2014 and September of 2018,
9 what's the longest number of days, consecutive
10 days, that you stayed at the Smyrna Red Roof Inn?

11 A Six.

12 Q When did that happen?

13 A Six, that was closer to 2018. So when we
14 started going in 2014, the visits were shorter. So
15 sometimes it would be a day; sometimes it would be
16 two days; and we'd come back two days later.

17 But then as time went by, and [REDACTED] had
18 a bunch of different things going on, he started
19 kind of leaving me at the hotel more. And I was
20 still scared, like, shitless to even attempt to try
21 and leave, you know.

22 So he would come back and get me and then,
23 you know, if things needed to die down, then we
24 would go somewhere for the night or for the week
25 and then come back.

1 Q All right. I want to ask you, Ms. [REDACTED]
2 about your stays at the Red Roof Inn. And by that,
3 I mean, if it was for one day and you left, I would
4 consider that a stay. If you slept overnight
5 consecutive days at the Red Roof Inn, I would
6 consider that one stay as well.

7 A Okay.

8 Q Do you know how many different stays you
9 had at the Red Roof Inn Smyrna from 2014 to 2018?

10 A No, sir.

11 Q Can you give me your best estimate on
12 that?

13 A Maybe like 10 or 12.

14 Q Maybe 10 or 12 stays?

15 A Yeah.

16 Q And that could be -- a stay could be one
17 day, it could be at most six days --

18 A Six days.

19 Q -- correct?

20 A Yes, sir.

21 Q Okay. So I know this isn't the case, but
22 if we assume that you only had one-day stays at the
23 Red Roof Inn Smyrna, using your 10 to 12, that
24 would mean at most 12 days at the Red Roof Inn
25 Smyrna? Do you follow me there?

1 BY MR. REAM:

2 Q Is that part of what you said people saw
3 of you online?

4 A Yes.

5 Q And part of what people did not see were,
6 like you said, the lies and manipulation that
7 told to you, right?

8 A Yes.

9 Q People did not see what happened behind
10 closed doors?

11 A Yes.

12 Q They did not see him beating you up behind
13 those closed doors, right?

14 A Right.

15 Q They did not see you -- well, they did not
16 see you having sex with these people behind those
17 closed doors, right?

18 A Right.

19 Q At the time between 2014 -- or even 2012
20 to September of 2018, at that time, Ms. did
21 you believe that you were a victim of sex
22 trafficking?

23 A I'm sorry. Can you repeat that for me?

24 Q At the time of 2012 through September of
25 2018, your period of alleged sex trafficking, did

1 you at that time believe that you yourself were a
2 victim of sex trafficking?

3 A No, I did not.

4 Q Do you believe now that you were?

5 A Yes, I do.

6 Q When did you come to that realization or
7 belief?

8 A Clearly, the day my daughter was born.

9 Q And that was in October 2020, right?

10 A Yeah.

11 Q If somebody had identified you as a sex
12 trafficking victim between 2012 and September of
13 2018, given that you didn't think that you were,
14 would you have even believed them?

15 MR. BAUMRIND: Objection.

16 A I don't know what to believe from somebody
17 else. I know it simply for myself.

18 BY MR. REAM:

19 Q And for you yourself, you didn't view
20 yourself as a sex trafficking victim at that time?

21 A No, I didn't. I was very young and
22 gullible. I was always looking for the easy way
23 out. And I guess in a sense I thought it was with
24 him from the beginning.

25 Q Ms. [REDACTED] some people have called sex

1 CERTIFICATE

2 STATE OF GEORGIA:

3 COUNTY OF FULTON:

4 I hereby certify that the foregoing
5 transcript was taken down, as stated in the
6 caption, and the colloquies, questions and answers
7 were reduced to typewriting under my direction;
8 that the transcript is a true and correct record of
9 the evidence given upon said proceeding.

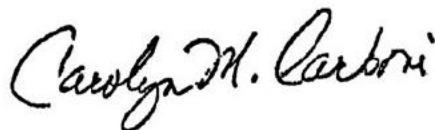
10 I further certify that I am not a relative
11 or employee or attorney of any party, nor am I
12 financially interested in the outcome of this
13 action.

14 I have no relationship of interest in this
15 matter which would disqualify me from maintaining
16 my obligation of impartiality in compliance with
17 the Code of Professional Ethics.

18 I have no direct contract with any party
19 in this action and my compensation is based solely
20 on the terms of my subcontractor agreement.

21 Nothing in the arrangements made for this
22 proceeding impacts my absolute commitment to serve
23 all parties as an impartial officer of the court.

2022.



24 CAROLYN M. CARBONI, RPR, RMR, CCR-B-878
25